

EXHIBIT E

Cadena, Maria
L.C., a minor v. State of California

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
Case No.: 5:22-cv-00949-KK-(SHKx)

L.C., a minor by and through her
guardian ad litem Maria Cadena,
individually and as
successor-in-interest to Hector
Puga; I.H., a minor by and through
his guardian ad litem Jasmine
Hernandez, individually and as
successor-in-interest to Hector
Puga; A.L., a minor by and through
her guardian ad litem Lydia Lopez,
individually and as
successor-in-interest to Hector
Puga; and ANTONIA SALAS UBALDO,
individually,

Plaintiffs,

v.

STATE OF CALIFORNIA; COUNTY OF
SAN BERNARDINO; S.S.C., a nominal
defendant; ISAIAH KEE; MICHAEL
BLACKWOOD; BERNARDO RUBALCAVA;
ROBERT VACCARI; JAKE ADAMS; and
DOES 6-10, inclusive,

Defendants.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF MARIA CADENA

Wednesday, December 11, 2024, 1:04 p.m.

Taken remotely via Zoom

REPORTED BY: Mary P. Randle, CSR No. 10312

1 APPEARANCES:

2 (Appearances via videoconference)

3
4 For Plaintiffs:

5 LAW OFFICES OF DALE K. GALIPO
6 HANG D. LE, ESQ.
7 21800 Burbank Boulevard
8 Suite 310
9 Woodland Hills, California 91367
10 818-347-3333
11 hlee@galipolaw.com

12
13 For Defendants County of San Bernardino, Robert Vaccari,
14 and Jake Adams:

15 LYNBERG & WATKINS, APC
16 SHANNON L. GUSTAFSON, ESQ.
17 1100 West Town & Country Road
18 Suite 1450
19 Orange, California 92868
20 714-937-1010
21 sgustafson@lynberg.com

22
23 For Defendants State of California by and through
24 California Highway Patrol and Michael Blackwood:

25 OFFICE OF THE ATTORNEY GENERAL
TORT & CONDEMNATION SECTION
DIANA ESQUIVEL, ESQ.
1300 I Street
Suite 125
Sacramento, California 95814-2951
916-210-7320
diana.esquivel@doj.ca.gov

Also Present:

Vionela Vaughn-Austin, Videographer

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1 TAKEN REMOTELY VIA ZOOM

2 WEDNESDAY, DECEMBER 11, 2024

3 1:04 P.M.

4
5 THE VIDEOGRAPHER: Good afternoon. This is the
6 video deposition of Maria Cadena, taken remotely on
7 December 11, 2024, in the matter of L.C. versus State of
8 California, Case Number 5:22-cv-004 -- pardon me --
9 52 -- 5:22-cv-00949-KK-(SHKx). This case is being heard
10 in the United States District Court of Central District
11 of California. The deposition is on the behalf of the
12 Defendant.

13 My name is Vionela Vaughn-Austin, and I'm the
14 legal videographer contracted through Dean Jones Legal
15 Videos, Inc., of Los Angeles and Santa Ana, California.
16 Now, because we're not in person, I, as the
17 videographer, may have to interrupt the proceedings if
18 the deponent drifts out of the frame or should any
19 connectivity issues occur with the Zoom.

20 This deposition is commencing at 1:04 p.m.
21 Would all present please identify yourselves, starting
22 with the court reporter, then the deponent, and then
23 counsel.

24 THE COURT REPORTER: Mary Randle on behalf of
25 Jilio-Ryan Court Reporters.

**Cadena, Maria
L.C., a minor v. State of California**

1 MS. GUSTAFSON: Can you state your name?

2 THE WITNESS: Oh, me?

3 THE VIDEOGRAPHER: Maria, would you please
4 state your name.

5 THE WITNESS: Sure. Maria Cadena.

6 MS. GUSTAFSON: Shannon Gustafson on behalf of
7 the County Defendants.

8 MS. ESQUIVEL: Diana Esquivel on behalf of the
9 State Defendants.

10 MS. LE: Hang Le on behalf of the Deponent and
11 the Plaintiffs in L.C. versus State of California.

12 THE VIDEOGRAPHER: Thank you. Now, would the
13 court reporter please administer the oath.

14

15 MARIA CADENA,

16 having been first duly sworn, was examined and

17 testified as follows:

18

19 EXAMINATION

20 BY MS. GUSTAFSON:

21 Q Can you please state your name for the record.

22 A Maria Cadena.

23 Q Have you ever used any name other than

24 Maria Cadena?

25 A No.

1 A Yes.

2 Q And how did she contact you three days ago?

3 A Through messenger on Facebook.

4 Q Did she say anything about why she was making
5 contact with you?

6 A No. I was just -- I just told her I was
7 surprised she got in contact with me. She was wondering
8 how my daughter was doing.

9 Q Has Layla and Serenity spent any time together
10 other than at the funeral?

11 A No.

12 Q Do you know Linda's last name?

13 A I don't.

14 Q Do you know where she lives?

15 A The last time I know, she lived in Los Angeles.

16 Q When you were with Hector, were you aware of
17 any time that he had been arrested?

18 A No.

19 Q Were you aware -- or are you aware that he's
20 ever been arrested of domestic violence?

21 A No.

22 Q Did he ever become violent with you?

23 A Just verbally.

24 Q Meaning you would have arguments where he would
25 yell?

1 A Yeah.

2 Q Did those happen frequently?

3 A Yes.

4 Q And would he typically be drinking during those
5 arguments or they would just happen at other times as
6 well?

7 A It was both, when he wasn't drinking and when
8 he was drinking.

9 Q Was there anything in particular that the two
10 of you would fight about?

11 A No. He was just a very jealous person.

12 Q Did you ever have any issues with him being
13 around other women when he was with you?

14 A No.

15 Q As you sit here today, do you know if Hector's
16 ever been arrested?

17 A No.

18 Q Do you know if he ever spent any time in prison
19 or jail?

20 A No.

21 Q Did you ever hear about an incident where he
22 was in a pursuit with L.A. Sheriff's Department and he
23 fired a gun at them?

24 A Yes.

25 Q How did you find out about that incident?

1 STATE OF CALIFORNIA)
2)
3 COUNTY OF SAN DIEGO)
4

5 I, Mary P. Randle, Certified Shorthand
6 Reporter in and for the State of California,
7 Certificate No. 10312, do hereby certify:

8 That prior to being examined, the witness named
9 in the foregoing deposition was by me first duly sworn
10 to testify to the truth, the whole truth, and nothing
11 but the truth;

12 That said deposition was taken remotely before
13 me at the time and place therein set forth and was taken
14 down by me in shorthand and thereafter transcribed into
15 typewriting under my direction and supervision;

16 I further certify that I am neither counsel for,
17 nor related to, any party to said action, nor in any way
18 interested in the outcome thereof.

19 In witness whereof, I have hereunto subscribed my
20 name.

21 Dated: December 22, 2024
22

23 Mary Randle, CSR#10312
24 MARY P. RANDLE
25 CSR No. 10312